

**EB Docket 06-36**

**Voluntary Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**

Date Filed: April 3, 2009

Name of Companies Covered by this Certification: TTI COMM

Form 499 Filer ID: 825218

Name of Signatory: Gustavo Oppel

Title of Signatory: President

I, Gustavo Oppel, certify that I am an officer of the company named above and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that it is in compliance with the requirements set forth in § 64.2001 *et seq.* of the Commission's rules.

The company has taken no actions (instituted a proceeding or filed a petition at either a state commission, a court or the Commission) against data brokers in the past year. The company does not possess any information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has received any customer complaints in calendar year 2007 concerning the unauthorized use of CPNI.

The steps the company has taken to protect CPNI are set forth in the statement accompanying this certification.

Signed: \_\_\_\_\_

Gustavo Oppel, President

**TTI COMM Corp.**  
**Statement of CPNI Procedures and Compliance**

It is the position of TTI COMM Corp. ("TTI COMM") that given its rather unique service model, the Company is not within the scope of entities required to provide an annual CPNI certification. Nonetheless, the Company makes this voluntary filing relating to calendar year 2008 merely out of an abundance of caution. In making this courtesy CPNI certification, TTI COMM in no way acquiesces to any tentative conclusion that it may be subject to the FCC's CPNI rules, nor does the Company in any way concede that such may be the case.


Rather, TTI COMM voluntarily files the instant CPNI certification to evidence its support for the FCC's commitment to ensuring the integrity of the personal information of consumers through the development of a full record of compliance efforts by the telecommunications industry as a whole.

Set forth below is a statement summarizing the policies and procedures of TTI COMM which ensure adequate compliance with the FCC's CPNI regulations. (*See 47 C.F.R. §64.2001 et seq.*) The Company provides telecommunications services almost exclusively on a prepaid basis. As a prepaid services provider, the Company did not have access to CPNI during calendar year 2007. Prepaid services customers do not "subscribe" to the services of the Company in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the Company's services.

These customers do not receive bills from TTI COMM and the Company does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the Company's prepaid services may lawfully be utilized by any authorized user of the purchaser, TTI COMM has no means of identifying the particular individual which has placed any particular call.

Nevertheless, TTI COMM has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the Company has adopted a strict policy that it will not release or distribute CPNI or any other confidential customer information to unauthorized individuals; neither does the Company use CPNI in violation of Section 64.2001. *et seq.* of the FCC's Rules.

To the extent Call Detail Records (CDRs) exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by the Company's underlying service provider in a secure location which is not accessible by employees of the Company; furthermore, such information is purged by the Company's underlying service provider on a routinely scheduled basis.



As noted above, TTI COMM does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information in violation of the FCC's CPNI rules. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, the Company takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

